



NATURAL RESOURCES COMMISSION

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DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

November 8, 1983

175655-0002
Hazardous Waste Division
Detroit District Office
1120 W. State Fair Ave.
Detroit, MI 48203
(313) 368-3335

Hi-Mill Manufacturing Co.
1704 Highland Road
Highland, MI 48031

U.S. EPA ID No: MID 005341714

Attention: Bob Beard, President

Dear Mr. Beard:

On October 31, 1983 I conducted an inspection at your facility along with Lynne King of the Groundwater Quality Division and Tom Maki and Sandra Lopez of the Air Quality Division. As part of this investigation, your facility was evaluated for compliance with the requirements of Subtitle C of the Resource Conservation Recovery Act (RCRA) as amended.

Based on information received at the time it appears that you presently meet the requirements of 40 CFR 261.5; Special Requirements for hazardous waste generated by small quantity generators. This determination is based on the fact that you generate less than 1000 kg. of spent solvent waste from your facility in any one calendar month.

Please be advised that you must insure your hazardous waste is handled in accordance with 40 CFR 261.5(g). Also, be advised that if your facility, at any time, generates a quantity of hazardous waste which exceeds the applicable exclusion level specified in 261.5 in any one calendar month, you are then subject to regulation under Parts 262 through 265 and Parts 122 and 124 of Chapter I and the notification requirements of Section 3010 of RCRA during that month. It is advised that you take all appropriate measures to assure that you do not accumulate, at any time, more than a total 1000 kilograms of your hazardous waste or acutely hazardous in quantities greater than set forth in 40 CFR 261.5(e) 1 or (e) 2 in order to continue to qualify for this exclusion.

The second waste of concern at your facility is the corrosive spent sulfuric and nitric acid from your aluminum pickling operation. This waste is neutralized in an "elementary neutralization unit" as defined in 40 CFR 260.10 and therefore is not subject to RCRA requirements as per 40 CFR 265.1 (c)(10). This waste is manifested as a liquid industrial waste under Michigan Act 136.

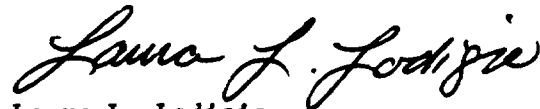
Third, there is an additional liquid industrial waste generated from your facility which is collected for storage in an underground tank. This waste is then transported by Great Northern Waste Oil to General Oil Company for disposal. The waste

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consists of various oils, coolants and miscellaneous waste from your processes. You indicated that this waste has been determined to be "non-hazardous" based on chemical analyses which was available at the time. For confirmation in our records I would like to request that you submit a copy of the analysis to me to the address in the upper right corner of page one of this letter.

If you have questions and/or concerns regarding the above matters or if I can be of further assistance regarding hazardous waste management, please contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION



Laura L. Lodisio
DETROIT DISTRICT OFFICE

LLL:pf

cc: L. King
T. Maki
J. Bohunsky
K. Burda
U.S. EPA